



June 10, 2016

Reference No. 038443-12

Ms. Leslie Patterson
Remedial Project Manager
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Region V
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Mr. Steve Renninger
On-Scene Coordinator
U.S. EPA Region V
Emergency Response Branch
26 West Martin Luther King Drive
Cincinnati, Ohio
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Dear Ms. Patterson and Mr. Renninger:

**Re: Progress Report: May 1 through 31, 2016
South Dayton Dump and Landfill Site, Moraine, Ohio (Site)**

This Monthly Progress Report is submitted in accordance with the Administrative Settlement and Order on Consent (ASAOC) for Remedial Investigation/Feasibility Study (RI/FS) Proceeding Under Sections 104, 107, and 122 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. §§ 9604, 9607, and 9622 (United States Environmental Protection Agency [USEPA]) Docket No. V-W-06-C-852) effective August 15, 2006 (RI/FS ASAOC), and the ASAOC for Removal Action Proceeding Under Sections 104, 106(a), 107, and 122 of the CERCLA, 42 U.S.C. §§ 9604, 9606(a), 9607, and 9622 USEPA Docket No. V-W-13-C-010, effective April 8, 2013 (Removal Action ASAOC), for the period of May 1 through 31, 2016.

The next Progress Report for the month of June 2016 will be submitted on or before July 10, 2016.

Significant Developments in this Reporting Period

RI/FS ASAOC Developments

Review of the final draft version of the ASAOC and Scope of Work (SOW) was conducted by the representatives of the Respondents. USEPA and GHD continued discussions regarding the RI/FS Work Plan content following the April 14 meeting.

Removal Action ASAOC Developments

On May 19, 2016, USEPA and the Respondents participated in a conference call regarding the status of the SSDS modifications.

During the May 19 conference call, the participants discussed the following topics:

- SSDS confirmatory sampling was conducted at Buildings 8 and 9 (B&G Equipment & Truck Repair) on April 13, 2016 to satisfy the requirement to collect samples 60 days after SSDS modifications. Analytical results show significant decreases in sub-slab (SS) VOC concentrations. Concentrations at SS-8-B and SS-8-D are less than Ohio Department of Health (ODH) Screening Levels. However, SS concentrations of Trichloroethylene (TCE) at SS-8-A and SS-9-A remain greater than ODH Screening Levels. USEPA proposed sub-slab stemline piping additions to SS-8-A and SS-9-A to target those locations for further VOC concentration reductions. GHD and Respondents will discuss the proposal for sub-slab stemline piping additions in Buildings 8 and 9.
- Sub-slab depressurization system (SSDS) modifications in Buildings 12, 14, and 15 were completed in April 2016 and sampling was originally scheduled for July, but is tentatively scheduled for June. The sampling of Buildings 12, 14, and 15 will serve to satisfy both the annual proficiency sampling and 60-day post SSDS-modification sampling requirements. USEPA agrees that the same goals are met if sampling is completed in June instead of July. The change to the sampling month was proposed based on the discussion regarding the Building 8 and 9 proposal detailed above.
- Next conference call will be scheduled based on the anticipated date of receipt of sampling results.

The status for each building requiring mitigation, as of May 31, 2016, is summarized in Attachment A.

Summaries of all Anticipated Problems and Planned Resolutions

No problems were encountered during the reporting month and none are currently anticipated.

Projected Work for the Next Reporting Period

- The Respondents and USEPA On-Scene Coordinator will continue to work together to discuss VI mitigation measures and implement the mitigation work plan.

Should you have any questions on the above, please do not hesitate to contact us.

Sincerely,

GHD



Julian Hayward

BR/cb/37

Encl.

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|------------------|----------------------------------------|------------------------------|
| cc: (all by pdf) | Leslie Patterson, U.S. EPA | Madelyn Adams, Ohio EPA |
| | Wendell Barner, Barner Consulting | Steve Quigley, GHD |
| | Tim Hoffman, Dinsmore & Shohl | Brett Fishwild, CH2M Hill |
| | Robin Lunn, Neal, Gerber & Eisenberg | Ken Brown, ITW |
| | Bryan Heath, NCR | Jim Campbell, EMI |
| | Scott Blackhurst, Kelsey Hayes Company | Wray Blattner, Thompson Hine |
| | Valerie Chan, GHD | |

Summary of Building Status

As of May 31, 2016, the status of each building requiring mitigation was as follows:

Building 8 (B&G Trucking):

- 30-day proficiency sampling completed on September 12, 2013, with additional confirmatory sampling completed on January 9, 2014 and March 10, 2014.
- 2015 indoor air (IA) and/or SS soil vapor sampling were completed on February 17, 2015, July 15, 2015, and October 6, 2015:
 - Trichloroethene concentration in SS soil vapor samples collected from probes SS-8-A and SS-8-B were greater than ODH screening level (AF of 33). GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in the SS soil vapor.
 - Benzene concentrations from IA locations IA-8-A and IA-8-D were less than ODH screening levels. Benzene concentration from IA location IA-8-F was greater than the ODH screening level in the July 2015 sampling round. Available evidence suggests IA benzene concentrations are the result of ongoing daily human activities within and around Building 8 as well as IA background sources, and are not the result of a complete VI pathway.
 - The fan at extraction point EP-3 was not operating during the majority of the July 2015 sampling round and was replaced late in the day on July 15, 2015.
 - The fans at extraction points EP-1 and EP-2 were not operating on September 29, 2015 and were replaced on October 1, 2015.
 - All fans were operational during the October 2015 sampling round.
- SSDS modifications including EP-3 and EP-5 stemline installations were completed on February 5, 2016.
- 60-day post-SSDS modification sampling was completed at Building 8 (B&G Equipment & Truck Repair) on April 13, 2016:
 - Analytical results show significant decreases in SS concentrations.
 - Concentrations at SS-8-B and SS-8-D are less than ODH Screening Levels. SS concentrations of TCE at SS-8-A remain greater than ODH Screening Levels.
 - USEPA proposed sub-slab stemline piping additions to SS-8-A to further target this location. GHD and Respondents will discuss the proposal for sub-slab stemline piping additions in Building 8.

Building 9 (B&G Trucking):

- 30-day and 180-day proficiency sampling completed on October 24, 2013 and March 10, 2014, respectively, with additional 180-day confirmatory sampling completed on May 20, 2014.

- Two rounds of 2015 IA and SS soil vapor sampling completed on February 17, 2015, and July 15, 2015:
 - TCE concentrations in samples collected from SS soil vapor probe SS-9-A remain greater than ODH screening levels. GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in SS soil vapor.
 - Benzene and xylenes were not detected in Building 9 during the July 2015 sampling round.
- SSDS modifications including EP-2 stemline installation and EP-3 installation were completed on February 5, 2016.
- 60-day post-SSDS modification sampling was completed at Building 9 (B&G Equipment & Truck Repair) on April 13, 2016.
 - Analytical results show significant decreases SS concentrations. However, SS concentrations of TCE at SS-9-A remain greater than ODH Screening Levels.
 - USEPA proposed sub-slab stemline piping additions to SS-8-A to further target this location. GHD and Respondents will discuss the proposal for sub-slab stemline piping additions in Building 9.

Building 12 (Overstreet Painting and S&J Precision):

- 30-day proficiency sampling completed on October 24, 2013. A corrective action was implemented on March 6, 2014 and additional confirmatory sampling was completed on April 2 and 3, 2014.
- Two rounds of 2015 IA and SS soil vapor sampling completed on February 18, 2015 and July 13, 2015:
 - TCE concentrations in SS soil vapor samples remain greater than ODH screening and action levels. GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in SS soil vapor.
 - cis-1,2-Dichloroethene (cis-1,2-DCE) concentrations in SS soil vapor samples have decreased to less than the ODH screening level.
 - Benzene remains present in IA samples at concentrations greater than ODH screening levels; however, based on available data, the benzene concentrations in indoor air are a result of ongoing daily human activities within and around Building 12, and are not the result of a complete VI pathway.
- Respondents and USEPA proposed SSDS modifications to the building owner and tenants during the January 28, 2016 meeting.
- SSDS modifications at Building 12 (Overstreet Painting and S&J Precision) began on April 4, 2016 and were completed by April 13, 2016.
- 60-day post-SSDS modification sampling and annual proficiency sampling will be completed in one joint event in June 2016, depending on building accessibility and the availability of GHD field staff.

Building 14 (NexGen Vending):

- 30-day proficiency sampling completed on January 16, 2014 and 180-day proficiency sampling completed on June 3, 2014.

- Two rounds of 2015 IA and SS soil vapor sampling completed on February 19, 2015 and July 16, 2015.
- The building is in compliance; IA and SS concentrations are less than ODH screening levels.
- A proposed SSDS modification (addition of an extraction point) was agreed upon during the January 28, 2016 meeting.
- SSDS modifications at Building 14 (NexGen Vending) were completed on April 6, 2016.
- 60-day post-SSDS modification sampling and annual proficiency sampling will be completed in one joint event in June 2016, depending on building accessibility and the availability of GHD field staff.

Building 15 (SIM Trainer):

- 30-day proficiency sampling completed on February 13, 2014. A corrective action was implemented on April 6, 2014 and additional confirmatory sampling was completed on April 24, 2014.
- Two rounds of 2015 IA and SS soil vapor sampling completed on February 18, 2015 and July 14, 2015.
- July 2015 TCE SS concentration at SS-15-C was greater than the ODH SS screening level (AF of 33).
- IA concentrations are less than ODH IA screening levels.
- Respondents and USEPA proposed SSDS modifications to the building owner during the January 28, 2016 meeting.
- SSDS modifications at Building 15 (SIM Trainer) were completed on April 6, 2016.
- 60-day post-SSDS modification sampling and annual proficiency sampling will be completed in one joint event in June 2016, depending on building accessibility and the availability of GHD field staff.

Building 17 (Megacity Construction):

- 30-day and 180-day proficiency sampling completed on January 16, 2014, and June 3, 2014, respectively.
- 1-year proficiency sampling completed on February 19, 2015.
- Annual proficiency sampling was completed on February 10, 2016.
- The building is in compliance.

Building 24 (Globe Equipment):

- 30-day, 180-day, and 1-year proficiency sampling completed on September 11, 2013, February 7, 2014, and December 5, 2014 respectively.
- One-year confirmatory sampling completed on February 20, 2015.
- Additional confirmatory sampling completed on July 16, 2015.
- SSDS modifications for Globe Equipment were completed on February 13, 2016.
- Annual proficiency sampling was completed on February 11, 2016.

- The building is in compliance; IA and SS concentrations are less than ODH screening levels:
 - The sub-slab sample result for SS-24-B was greater than the ODH screening level (AF=10) but less than the secondary screening level (AF=33).